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Attorneys for Defendant Romi Omar Mayder, an individual, Wesley Mayder, an individual, Silicon Test Systems, Inc. a California Corporation, and Silicon Test Solutions, LLC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

Civil Case No.: C07-04330 RMW (HRL)

Plaintiff,

vs.

ROMI OMAR MAYDER, an individual,
WESLEY MAYDER, an individual,
SILICON TEST SYSTEMS, INC. a
California Corporation, SILICON TEST
SOLUTIONS, LLC, a California Limited
Liability Corporation, inclusive,

Defendants.

Civil Case No.: C07-04330 RMW (HRL)

**DECLARATION OF RICHARD O.
FOSTER, FORMERLY DIRECTOR
OF MANUFACTURING FOR
ANRITSU CORPORATION**

Date: N/A
Time: N/A
Dent.: Judge: Hon. Judge Whyte

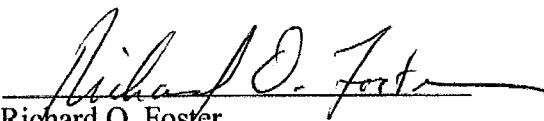
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I, Richard O. Foster, declare as follows:

- 1) I have personal knowledge of all the facts set forth in this declaration and, if called upon to
2) testify in this Court as to those facts, my testimony would be as stated herein.
- 3) I am now retired, but previously was Director of Manufacturing for Anritsu Company
4) ("Anritsu"), the North American subsidiary of Anritsu Corporation based in Tokyo, Japan.
5) As Director, I oversaw the manufacturing in Morgan Hill, CA of General Purpose Test
6) Equipment, and Precision Radio Frequency ("RF") and Microwave Components. One key
7) market for Anritsu was, and remains, Automated Test Equipment manufacturers, such as
8) Verigy and Teradyne (a Verigy competitor in ATE). I worked at Anritsu for over 20
9) years.
- 10) 3) ATE systems have a probe card/board which interfaces between the ATE tester and the
11) Device Under Test ("DUT"). Most probe boards contain integrated circuits that allow the
12) tester to selectively transmit the same signal to different DUTS either simultaneous (called
13) fan-out) or sequentially (called time multiplexing). Integrated circuit switches, usually
14) field effect transistors ("FETS"), are used to implement the selective transmission of tester
15) channels.
- 16) 4) During 1994 and 1995, Anritsu was asked by Teradyne to provide certain modules which
17) enhanced the capabilities of their testers. An internal strategic evaluation of this business
18) opportunity revealed that Teradyne's business (and therefore Anritsu's) could be
19) significantly impacted if additional switches (a technology already in use) were added to
20) the probe cards thus offloading the burden from the expensive ATE testers. This would
21) reduce the cost per channel for testing semiconductor wafers and chips. In this manner,
22) more devices under test ("DUTS") could be tested with the same number of tester
23) channels. Anritsu did not consider these ideas trade secrets because these
24)
25)
26)
27)

1 techniques were well known and, in fact, were requested in the equipment being supplied
2 to Teradyne by Anritsu.

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4 I declare, under penalty of perjury the foregoing is true and correct, executed this 4th day
5 of October 2007 in Pismo Beach, California.

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8 
Richard O. Foster

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